

Re: Proposed Rulemaking, CAFE standards, light trucks

The proposed standards are woefully inadequate and unsupportable as a matter of fact and law.

The technology exists and is in place to increase light truck/SUV fuel economy by 20% without downsizing the vehicles or inordinately lightening them. The benefits for requiring these higher fuel economy standards far outweigh the costs to both the purchasers of these vehicles and the country as a whole. For consumers, the savings realized in fuel costs over the life of the vehicle are far greater than minimal additional costs incurred in manufacturing. The benefits to the environment in greenhouse gas reduction and reduced production and importation of oil are vast and unfortunately, not readily reduced to dollars and cents. The benefit in national security by reducing dependence on foreign sources of oil, particularly from the volatile middle east is similarly vast and also similarly not easily reduced to a calculable dollar figure. The agency has not taken into account the actual benefit from a greater reduction in CAFE and as such, it's proposed rulemaking is arbitrary, capricious, unsupportable and an abuse of discretion.